

RE: US v Halkbank

Cary, Rob <RCary@wc.com>

Mon 3/30/2020 11:00 AM

To: Richard Berman <Richard_Berman@nysd.uscourts.gov>; Berman NYSD Chambers <BermanNYSDChambers@nysd.uscourts.gov>

Cc: Kamaraju, Sidhardha (USANYS) <Sidhardha.Kamaraju@usdoj.gov>; Denton, David (USANYS) <David.Denton@usdoj.gov>; Rebold, Jonathan (USANYS) <Jonathan.Rebold@usdoj.gov>; Lockard, Michael (USANYS) <Michael.Lockard@usdoj.gov>

Dear Judge Berman:

Thank you for your email of Friday afternoon. I have now had the opportunity to consult over the weekend with our client and we have been authorized to proceed to arraignment on Tuesday by telephone. A hearing, of course, would have been preferred to introduce myself to the Court and to discuss the challenges posed by the COVID-19 crisis to meeting and consulting with my client in Turkey to prepare and develop the legal and factual defenses in this case.

I am confident, however, that we can constructively begin to address all such challenges on Tuesday by telephone and, indeed, if helpful, via video conference. To the extent helpful to the Court's inquiry about a teleconference arraignment, and given the unprecedented circumstances we face, we are prepared to move forward according to the Court's Order (Doc. 614).

I have the dial-in information, and I also look forward to meeting you by telephone on Tuesday.

Respectfully,

Rob Cary

Robert M. Cary

Williams & Connolly LLP

725 Twelfth Street, N.W., Washington, D.C. 20005

(P) 202-434-5175 I(F) 202-434-5029

RCary@wc.com I[www.wc.com/rcary]www.wc.com/rcary

From: Richard Berman <Richard_Berman@nysd.uscourts.gov>

Sent: Friday, March 27, 2020 2:40 PM

To: Cary, Rob <RCary@wc.com>

Subject: US v Halkbank

Dear Mr. Cary,

Thank you for your letter of March 27, 2020 advising that Williams & Connolly is authorized to appear on behalf of Halkbank at the scheduled arraignment on March 31, 2020. You are most welcome to participate in these proceedings.

Chelsea Talbot mentioned that she has advised you that we are holding the arraignment via teleconference, if that is acceptable to you, and that she forwarded to you the details of participating by phone.

I look forward to meeting you.

Richard M. Berman, USDJ

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